

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

BAHRAM SHAKERI

Plaintiff

v.

PRINCE GEORGE’S COUNTY, MARYLAND

Defendant

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8:21-cv-00549-GJH

JOINT MOTION TO EXTEND DEADLINES

NOW COME, Plaintiff, Bahram Shakeri, and Defendant, Prince George’s County, in this matter and hereby jointly request the following modification of the Scheduling Order:

1. The Parties continue to work together to work through discovery in this matter.
2. However, both Parties need more time to complete the necessary discovery in this matter to efficiently resolve the issues between the Parties.
3. No trial date has been set in this matter.
4. Both Parties request the following modifications to the Scheduling Order:

Amendment of Pleadings Deadline	January 31, 2023
Completion of Factual Discovery	March 31, 2023
Initial Expert Disclosures	May 24, 2023
Rebuttal Expert Disclosures	June 24, 2023
Completion of Expert Discovery. Submission of Status Report	April 21, 2023
Dispositive Pretrial Motion Deadline	May 19, 2023

Respectfully submitted,

By: /s/ Faisal Gill
Faisal Gill, Esq.
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Counsel for Plaintiff

By: /s/ Tonia Belton-Gofreed
Tonia Belton-Gofreed, Fed. Bar No. 16176
Associate County Attorney
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Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the ___ day of December 2022, a copy of the foregoing document was electronically transmitted to this Court and served via CM/ECF and email on:

Tonia Belton-Gofreed, Fed. Bar No. 16176
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Counsel for Defendant

/s/ Faisal Gill
Faisal Gill